

1 BRIAN J. STRETCH (CABN 163973)
United States Attorney

2 ELISE BECKER (NYBN2540730)
3 Deputy Chief, Criminal Division

4 GREGORY D. BERNSTEIN (CABN 299204)
Trial Attorney
5 United States Department of Justice

6 COLIN C. SAMPSON (CABN 249784)
Assistant United States Attorney

7 450 Golden Gate Avenue, 11th Floor
8 San Francisco, CA 94102-3495
Telephone: (415) 436-7020
9 Fax: (415) 436-7009
Email: colin.sampson@usdoj.gov

10 Attorneys for United States of America

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 OAKLAND DIVISION
14

15 UNITED STATES OF AMERICA,)	CR 17-00191-JST
)	
16 Plaintiff,)	STIPULATION AND PROPOSED ORDER TO
)	EXCLUDE TIME UNDER THE SPEEDY
17 v.)	TRIAL ACT
)	
18 KENNETH TAYLOR,)	
)	
19 SHARON RINGGENBERG, and)	
)	
20 CRAIG SCOTT,)	
)	
21 Defendants.)	

22 The parties hereby STIPULATE and AGREE as follows:

23 1. On April 14, 2017, a federal grand jury in the Northern District of California returned a
24 five-count Indictment alleging that Defendants Kenneth Taylor, Sharon Ringgenberg, and Craig Scott
25 conspired to and did commit wire fraud with respect to a business providing fraudulent standby letters of
26 credit and proof of funds statements, in violation of 18 U.S.C. §§ 1343 and 1349, and that Kenneth
27 Taylor signed and filed false 2009 and 2010 federal income tax returns in which he failed to report
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income from the fraud scheme, in violation of 26 U.S.C. § 7206(1).

2. On May 22, 2017, the Court issued a Protective Order regarding the discovery materials that the government plans to serve on Defendants. *See* Doc. No. 17.

3. On May 25, 2017, the government served initial discovery on all defendants. The government estimates that this production contains in excess of 70,000 pages of documents.

4. On May 26, 2017, Kenneth Taylor and Craig Scott, represented by their respective counsel, and the government, represented by Assistant U.S. Attorney Colin Sampson, appeared for an initial status hearing before United States District Judge Jon S. Tigar. The matter was continued to July 21, 2017, in order for counsel to review recently-produced discovery.

Accordingly, the United States and Defendants Kenneth Taylor, and Craig Scott, hereby STIPULATE AND AGREE that time under the Speedy Trial Act be excluded from May 26, 2017, to July 21, 2017, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (b)(iv) to allow for effective preparation of counsel, taking into account the exercise of due diligence.

Respectfully submitted,

BRIAN J. STRETCH
United States Attorney

Dated: May 30, 2017.

/s/ Colin Sampson
COLIN SAMPSON
Assistant United States Attorney
GREGORY D. BERNSTEIN
Trial Attorney

Dated: May 30, 2017.


/s/ Martha Boersch
MARTHA BOERSCH
 Attorney for Defendant Kenneth Taylor

Dated: May 30, 2017.

/s/ John Paul Reichmuth
JOHN PAUL REICHMUTH
Attorney for Defendant Craig Scott

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IT IS SO ORDERED.


THE HONORABLE JON S. TIGAR
UNITED STATES DISTRICT JUDGE